

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NINGBO PORT ZHONGDI LUGGAGE
MANUFACTURING LIMITED,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”

Defendants.

Case No. 1:24-cv-05031

Honorable LaShonda A. Hunt

Mag. Judge Young B. Kim

JOINT STIPULATION FOR ENTRY OF A PRELIMINARY INJUNCTION

Plaintiff Ningbo Port Zhongdi Luggage Manufacturing Limited (“Plaintiff”) and Defendants INFANS, Gymax LLC, GoPlusUS, Costzon, and Honeyjoy (the “Stipulating Defendants”) stipulate to the entry of the following Preliminary Injunction in full resolution of the Motion for Entry of Preliminary Injunction [ECF No. 26].

1. Plaintiff initiated this lawsuit on June 18, 2024 [ECF No. 1]. Plaintiff filed an Amended Complaint on July 19, 2024 [Dkt. 9], and moved for a Temporary Restraining Order (“TRO”) on July 23, 2024 [ECF No. 15]. This Court granted the TRO on July 24, 2024 [ECF No. 20] and signed the Order on July 29, 2024 [ECF No. 21]. The TRO expired on August 12, 2024, under the Federal Rules of Civil Procedure. On August 12, 2024, the Court denied an extension of the TRO [ECF No. 24].

2. Plaintiff filed a Motion for Entry of Preliminary Injunction on August 23, 2024 (the “Motion”) [ECF No. 26], seeking an asset freeze of financial accounts associated with the Stipulating Defendants. The Court took the Motion under advisement on August 27, 2024, and scheduled a motion hearing on September 5, 2024 [ECF No. 28]. The Stipulating Defendants

filed a Response in Opposition to the Motion on September 5, 2024 [ECF No. 31]. During the hearing on September 5, 2024, the Court granted the Plaintiff's request to continue the Motion until a secondary hearing on September 19, 2024 [ECF No. 32]. During the September 19, 2024 hearing, the Plaintiff requested an additional 7 days to file a reply in support of its Motion by September 26, 2024, which the Court granted [ECF No. 47].

3. Since the September 19, 2024 hearing, the Plaintiff and Stipulating Defendants have reached an agreed resolution of the Motion.

4. The Stipulating Defendants shall not make, sell, offer for sale, or import (and shall not with actual knowledge cause the making, selling, offering for sale, or importing of) any of the products accused of infringement in Schedule A of the Amended Complaint [ECF No. 14] during the pendency of the instant lawsuit.

5. Plaintiff and Stipulating Defendants further agree that there will be no asset restraint as a result of the Motion against the financial accounts of any of the Stipulating Defendants.

6. Both parties withdraw their respective requests for any other relief sought against each other through their respective filings in relation to the Motion.

7. This stipulation does not affect any party's rights or obligations under agreements previously entered into between the parties.

8. This stipulation does not affect the Plaintiff's rights or claims with respect to any defendants other than the Stipulating Defendants.

Dated this 27th day of September 2024.

Respectfully submitted,

/s/ Qin Li

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